

Exhibit A

Dalsen, William D.

From: Dalsen, William D.
Sent: Thursday, April 4, 2019 3:40 PM
To: 'Sooknanan, Sparkle L.'; Sushon, Bill; Bassett, Nicholas; mpocha@omm.com
Cc: Stewart, Geoffrey S.; Bennett, Bruce S.; Rosenblum, Benjamin; Perez, Isel M.; Papez, Matthew E.; afernandez@delgadofernandez.com; jcunningham@whitecase.com; jzakia@whitecase.com; Martin, Moneyede; alavergne@sanpir.com; Dale, Margaret A.; Mazurek, Carl A.; Rosen, Brian S.; Levitan, Jeffrey W.; Possinger, Paul V.; pfriedman@omm.com; McKeen (External), Elizabeth; Neve, Brett M.; alexbongartz@paulhastings.com; lucdespins@paulhastings.com; cstegee@jenner.com; mpocha@omm.com; csloane@whitecase.com; csloane@whitecase.com
Subject: RE: Agenda for April 1 Hearing: In re Commonwealth of Puerto Rico, et al., Case No. 17-3283 (LTS) // In re Employees Retirement System of Gov't of Commonwealth of Puerto Rico, Case No. 17-3566 (LTS)

Sparkle –

We will agree to review documents that hit on the same agreed-upon search terms reached with the Commonwealth and ERS (as modified to address the proximity-limiter issue described below) across all Board members as custodians, de-duplicated across those custodians to review unique direct hits.

As to the deposition, we are willing to continue our discussion concerning the deposition subpoena to the Oversight Board. In view of Judge Dein's remarks at the hearing suggesting Movants should depose the Commonwealth and ERS in the first instance to identify what information, if any, the Oversight Board has "separate and apart" from the Commonwealth and ERS, we believe that continued discussions are necessary and warranted. To be clear, we are not refusing to produce a witness in response to the subpoena, and we are expressly agreeing to continue discussing this matter with Movants.

Thank you.

--Will

William D. Dalsen

Attorney at Law

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Please consider the environment before printing this email.

From: Sooknanan, Sparkle L. <ssooknanan@jonesday.com>
Sent: Wednesday, April 3, 2019 4:53 PM
To: Dalsen, William D. <wdalsen@proskauer.com>; Sushon, Bill <wsushon@omm.com>; Bassett, Nicholas <nicholasbassett@paulhastings.com>; mpocha@omm.com
Cc: Stewart, Geoffrey S. <gstewart@JonesDay.com>; Bennett, Bruce S. <bbennett@jonesday.com>; Rosenblum,

Benjamin <brosenblum@JonesDay.com>; Perez, Isel M. <iperez@jonesday.com>; Papez, Matthew E. <mpapez@jonesday.com>; afernandez@delgadofernandez.com; jcunningham@whitecase.com; jzakia@whitecase.com; Martin, Moneyede <moneyede.martin@whitecase.com>; alavergne@sanpir.com; Dale, Margaret A. <mdale@proskauer.com>; Mazurek, Carl A. <cmazurek@proskauer.com>; Rosen, Brian S. <brosen@proskauer.com>; Levitan, Jeffrey W. <JLevitan@proskauer.com>; Possinger, Paul V. <ppossinger@proskauer.com>; pfriedman@omm.com; McKeen (External), Elizabeth <emckeen@omm.com>; Neve, Brett M. <bneve@omm.com>; alexbongartz@paulhastings.com; lucdespins@paulhastings.com; cstegee@jenner.com; mpocha@omm.com; csloane@whitecase.com; csloane@whitecase.com

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Will,

Thank you for sending these proposed search parameters.

1. **Custodians:** All Board members should be included as custodians, though you can de-duplicate across custodians to review unique documents only. In addition, to further ease the burden, we do not object to you de-duplicating documents against the Commonwealth, ERS, or AAFAF custodians.
2. **Date Range:** Judge Dein's order on the date range was without prejudice to the Bondholders moving for an earlier start date if document productions reveal that an earlier date is warranted. We understand from public documents that the Oversight Board began discussing pension reforms as early as October or November 2016, so we anticipate that there will be responsive documents earlier than January 1, 2017. Further, since the Board was not affected by the change in administration, the accessibility point made by the Commonwealth, ERS, and AAFAF is not relevant. Thus, although we agree that you should begin reviewing documents with a January 1, 2017 start date, we are specifically reserving our ability to request that you go back further in time.
3. **Search Terms:** As we indicated at the hearing, we agree to the same search terms for the Board. The modification you noted below is not an issue.

We are happy to discuss this further. In addition, please let us know if the Oversight Board will designate a witness with respect to our deposition subpoena since we also need to provide the Court with an update on that issue on Friday.

Thanks,
Sparkle

Sparkle L. Sooknanan
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From: Dalsen, William D. <wdalsen@proskauer.com>
Sent: Wednesday, April 3, 2019 1:39 PM
To: Sooknanan, Sparkle L. <ssooknanan@jonesday.com>; Papez, Matthew E. <mpapez@jonesday.com>; Sushon, Bill <wsushon@omm.com>; Bassett, Nicholas <nicholasbassett@paulhastings.com>; mpocha@omm.com
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Sparkle –

In view of the hearing before Judge Dein on Monday, here are the search parameters we are willing to run for the Oversight Board:

1. Custodians: Carlos Garcia, Natalie Jaresko, Ana Matasantos, and Andrew Biggs.
2. Date Range: January 1, 2017 to October 1, 2017.
 - a. This is the same date range Movants and the Commonwealth/ERS have agreed to run, with the start date set by Judge Dein.
3. Search Terms:
 - a. ("Pay-Go" OR "pay-as-you-go" OR (pay w/1 go) OR "Law 106" OR "Act 106" OR "Joint Resolution 188" OR "SB 603" OR ERS or "employees retirement system" OR legislation OR legislature OR statute) w/50 ((employer* w/2 contribut*) OR bond* OR "security interest" OR pledge* OR collateral)
 - i. This is the same search Movants and the Commonwealth/ERS have agreed to.
 - ii. Due to software limitations with multiple proximity limiters, we are breaking that search into two:
 1. ("Pay-Go" OR "pay-as-you-go" OR "Law 106" OR "Act 106" OR "Joint Resolution 188" OR "SB 603" OR ERS or "employees retirement system" OR legislation OR legislature OR statute) w/50 ((employer* w/2 contribut*) OR bond* OR "security interest" OR pledge* OR collateral)
 2. (pay w/1 go) AND ((employer* w/2 contribut*) OR bond* OR "security interest" OR pledge* OR collateral)
 - b. ("employees retirement system" OR ERS*) AND (analy* OR breakdown* OR estimate* OR "financial plan*" OR forecast* OR model* OR opinion* OR predict* OR propos* OR review*) w/25 valu*
 - c. ("employees retirement system" OR ERS*) AND (decreas* OR dimin*) w/2 valu*

We are starting our review using these parameters promptly given the schedule in this matter.

Thank you.

--Will

William D. Dalsen
Attorney at Law

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From: Sooknanan, Sparkle L. <ssooknanan@jonesday.com>

Sent: Tuesday, April 2, 2019 1:05 PM

To: Dalsen, William D. <wdalsen@proskauer.com>; Papez, Matthew E. <mpapez@jonesday.com>; Sushon, Bill <wsushon@omm.com>; Bassett, Nicholas <nicholasbassett@paulhastings.com>; mpocha@omm.com

Cc: Stewart, Geoffrey S. <gstewart@JonesDay.com>; Bennett, Bruce S. <bbennett@jonesday.com>; Rosenblum, Benjamin <brosenblum@JonesDay.com>; Perez, Isel M. <iperez@jonesday.com>; afernandez@delgadofernandez.com; jcunningham@whitecase.com; izakia@whitecase.com; Martin, Moneyede <moneyede.martin@whitecase.com>; alavergne@sanpir.com; Dale, Margaret A. <mdale@proskauer.com>; Mazurek, Carl A. <cmazurek@proskauer.com>; Rosen, Brian S. <brosen@proskauer.com>; Levitan, Jeffrey W. <JLevitan@proskauer.com>; Possinger, Paul V. <ppossinger@proskauer.com>; pfriedman@omm.com; McKeen (External), Elizabeth <emckeен@omm.com>; Neve, Brett M. <bneve@omm.com>; alexbongartz@paulhastings.com; lucdespins@paulhastings.com; cstegee@jenner.com; mpocha@omm.com; csloane@whitecase.com; csloane@whitecase.com

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Will,

Our joint status report on the document and deposition subpoenas served to the Oversight Board is due on Friday. At yesterday's hearing, you indicated that your initial searches for the Oversight Board returned approximately 6,000 direct hits. Please send us the search parameters you used, including search terms, custodians, and date range, so we may consider them.

Thank you,

Sparkle

Sparkle L. Sooknanan

Associate

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From: Dalsen, William D. <wdalsen@proskauer.com>

Sent: Sunday, March 31, 2019 6:38 PM

To: Papez, Matthew E. <mpapez@jonesday.com>; Sushon, Bill <wsushon@omm.com>; Bassett, Nicholas <nicholasbassett@paulhastings.com>; mpocha@omm.com

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Matt –

Thank you. We'll get this on file either tonight or first thing tomorrow morning.

--Will

William D. Dalsen

Attorney at Law

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From: Papez, Matthew E. <mpapez@jonesday.com>

Sent: Sunday, March 31, 2019 12:17 PM

To: Dalsen, William D. <wdalsen@proskauer.com>; Sushon, Bill <wsushon@omm.com>; Bassett, Nicholas <nicholasbassett@paulhastings.com>; mpocha@omm.com

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Will,

We are in agreement. I have attached an updated version of the agenda that I sent on Friday afternoon, which now includes the names of the lawyers on our side who will be arguing each of the motions.

Thanks,

Matt

Matthew E. Papez (bio)

Partner

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From: Dalsen, William D. <wdalsen@proskauer.com>
Sent: Saturday, March 30, 2019 7:13 PM
To: Papez, Matthew E. <mpapez@jonesday.com>; Sushon, Bill <wsushon@omm.com>; Bassett, Nicholas <nicholasbassett@paulhastings.com>; mpocha@omm.com
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Matt –

We do not agree with your approach and do not believe the Court will find it convenient. But, solely to avoid burdening the Court with competing proposals on Monday in the mid-morning when Movants say they would file their separate paper, we (the respondent parties) are willing to agree to your last proposal from your email of 4:31 p.m. Eastern yesterday (March 29, 2019), which I've attached here.

Please confirm that is acceptable—and supply a revision of that last proposal that includes the names of the lawyers who will argue for Movants—by 5:00 p.m. Eastern tomorrow, Sunday, March 31. We will then file either tomorrow night or first thing Monday morning.

Thank you.

--Will

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Sent: Saturday, March 30, 2019 5:26 PM
To: Dalsen, William D. <wdalsen@proskauer.com>; Sushon, Bill <wsushon@omm.com>; Bassett, Nicholas <nicholasbassett@paulhastings.com>; mpocha@omm.com
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Will,

We'll submit a separate paper on Monday morning, around 10:30.

Thanks,

Matt

Matthew E. Papez (bio)

Partner

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Sent: Friday, March 29, 2019 7:43 PM

To: Papez, Matthew E. <mpapez@jonesday.com>; Sushon, Bill <wsushon@omm.com>; Bassett, Nicholas <nicholasbassett@paulhastings.com>; mpocha@omm.com

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Matt –

It appears we need to submit competing agendas, which I would think we can do in a single filing. If that works, please send our draft back to us with your proposal inserted after our proposal. Additionally, if you can provide some reason to change the argument order from what was briefed other than stating Movants "are entitled to present argument on the issues in our motion in the order we would like," let us know so we can consider it.

--Will

William D. Dalsen

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Bill,
Then we do not have an agreement.
Thanks,
Matt

Matthew E. Papez (bio)
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Matt -- you chose the order of your issues when you submitted your motion to compel to the Court. We do not consent to your new proposed rearrangement. We are offering you the luxury of going first, but we will only do so if you'll agree to maintain the order of the arguments as you chose to present them in your brief.

Bill

O'Melveny

William J. Sushon

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Subject: RE: Agenda for April 1 Hearing: In re Commonwealth of Puerto Rico, et al., Case No. 17-3283 (LTS) // In re Employees Retirement System of Gov't of Commonwealth of Puerto Rico, Case No. 17-3566 (LTS)

Will,

The order of argument in my revised redline is the order that was in your email last night, and the order that we discussed on the phone this morning. But even putting that aside, it's our motion to compel, and we're entitled to present argument on the issues in our motion in the order we would like.

We'll send the names once we have it finalized. Or, if you prefer, once we have the names finalized we'll put them into my revised redline, and then circulate that for final review & filing. Just let us know which you prefer.

Thanks,
Matt

Matthew E. Papez (bio)

Partner

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From: Dalsen, William D. <wdalsen@proskauer.com>
Sent: Friday, March 29, 2019 4:58 PM
To: Papez, Matthew E. <mpapez@jonesday.com>; Bassett, Nicholas <nicholasbassett@paulhastings.com>; mpocha@omm.com
Cc: Stewart, Geoffrey S. <gstewart@JonesDay.com>; Bennett, Bruce S. <bbennett@jonesday.com>; Rosenblum, Benjamin <brosenblum@JonesDay.com>; Perez, Isel M. <iperez@jonesday.com>; afernandez@delgadofernandez.com; jcunningham@whitecase.com; izakia@whitecase.com; Martin, Moneyede <moneyede.martin@whitecase.com>; alavergne@sanpir.com; Dale, Margaret A. <mdale@proskauer.com>; Mazurek, Carl A. <cmazurek@proskauer.com>; brosen@proskauer.com; JLevitana@proskauer.com; ppossinger@proskauer.com; pfriedman@omm.com; Sushon, Bill <wsushon@omm.com>; McKeen (External), Elizabeth <emckeen@omm.com>; Neve, Brett M. <bneve@omm.com>; alexbongartz@paulhastings.com; lucdespins@paulhastings.com; cstege@jenner.com; Sooknanan, Sparkle L. <ssooknanan@jonesday.com>; mpocha@omm.com; cslotane@whitecase.com; cslotane@whitecase.com
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Matt –

The parties should present argument in the order the issues were briefed, which is not only how the parties each chose to present the issues but also how the oppositions were structured. Doing otherwise asks the Court to flip around two sets of briefs rather than addressing the issues sequentially, which doesn't make sense.

Please let us know who from Movants' side will handle each issue. We'll then insert their name into our proposed schedule and circulate for a final review.

--Will

William D. Dalsen
Attorney at Law

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From: Papez, Matthew E. <mpapez@jonesday.com>
Sent: Friday, March 29, 2019 4:31 PM
To: Dalsen, William D. <wdalsen@proskauer.com>; Bassett, Nicholas <nicholasbassett@paulhastings.com>; mpocha@omm.com
Cc: Stewart, Geoffrey S. <gstewart@JonesDay.com>; Bennett, Bruce S. <bbennett@jonesday.com>; Rosenblum, Benjamin <brosenblum@JonesDay.com>; Perez, Isel M. <iperez@jonesday.com>; afernandez@delgadofernandez.com; jcunningham@whitecase.com; izakia@whitecase.com; Martin, Moneyede <moneyede.martin@whitecase.com>; alavergne@sanpir.com; Dale, Margaret A. <mdale@proskauer.com>; Mazurek, Carl A. <cmazurek@proskauer.com>;

Rosen, Brian S. <brosen@proskauer.com>; Levitan, Jeffrey W. <JLevitan@proskauer.com>; Possinger, Paul V. <ppossinger@proskauer.com>; pfriedman@omm.com; Sushon, Bill <wsushon@omm.com>; McKeen (External), Elizabeth <emckeен@omm.com>; Neve, Brett M. <bneve@omm.com>; alexbongartz@paulhastings.com; lucdespins@paulhastings.com; cstege@jenner.com; Sooknanan, Sparkle L. <ssooknanan@jonesday.com>; mpocha@omm.com; csloane@whitecase.com; csloane@whitecase.com

Subject: RE: Agenda for April 1 Hearing: In re Commonwealth of Puerto Rico, et al., Case No. 17-3283 (LTS) // In re Employees Retirement System of Gov't of Commonwealth of Puerto Rico, Case No. 17-3566 (LTS)

Will,

Thanks for the draft. We're still sorting out which lawyers will argue each issue, and we will send you that once we're final with it. In the meantime, attached is a redline to reflect the order in which we intend to present argument on two of the issues within our motion.

Thanks,

Matt

Matthew E. Papez (bio)

Partner

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From: Dalsen, William D. <wdalsen@proskauer.com>

Sent: Friday, March 29, 2019 3:30 PM

To: Bassett, Nicholas <nicholasbassett@paulhastings.com>; Papez, Matthew E. <mpapez@jonesday.com>; mpocha@omm.com

Cc: Stewart, Geoffrey S. <gstewart@JonesDay.com>; Bennett, Bruce S. <bbennett@jonesday.com>; Rosenblum, Benjamin <brosenblum@JonesDay.com>; Perez, Isel M. <iperez@jonesday.com>; afernandez@delgadofernandez.com; jcunningham@whitecase.com; izakia@whitecase.com; Martin, Moneyede <moneyede.martin@whitecase.com>; alavergne@sanpir.com; Dale, Margaret A. <mdale@proskauer.com>; Mazurek, Carl A. <cmazurek@proskauer.com>; brosen@proskauer.com; JLevitan@proskauer.com; ppossinger@proskauer.com; pfriedman@omm.com; Sushon, Bill <wsushon@omm.com>; McKeen (External), Elizabeth <emckeен@omm.com>; Neve, Brett M. <bneve@omm.com>; alexbongartz@paulhastings.com; lucdespins@paulhastings.com; cstege@jenner.com; Sooknanan, Sparkle L. <ssooknanan@jonesday.com>; mpocha@omm.com; csloane@whitecase.com; csloane@whitecase.com

Subject: RE: Agenda for April 1 Hearing: In re Commonwealth of Puerto Rico, et al., Case No. 17-3283 (LTS) // In re Employees Retirement System of Gov't of Commonwealth of Puerto Rico, Case No. 17-3566 (LTS)

All –

Following my discussion with Matt Papez, here is a proposed agenda for the April 1 hearing.

Please advise whether you have any comments and, obviously, which lawyer will be arguing from Jones Day or White & Case as to each of the issues. We would like to get this on file today.

Thank you.

--Will

William D. Dalsen

Attorney at Law

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From: Bassett, Nicholas <nicholasbassett@paulhastings.com>

Sent: Friday, March 29, 2019 9:37 AM

To: Dalsen, William D. <wdalsen@proskauer.com>; Papez, Matthew E. <mpapez@jonesday.com>; mpocha@omm.com

Cc: Stewart, Geoffrey S. <gstewart@JonesDay.com>; Bennett, Bruce S. <bbennett@jonesday.com>; Rosenblum, Benjamin <brosenblum@JonesDay.com>; Perez, Isel M. <iperez@jonesday.com>; afernandez@delgadofernandez.com; jcunningham@whitecase.com; izakia@whitecase.com; Martin, Moneyede <moneyede.martin@whitecase.com>; alavergne@sanpir.com; Dale, Margaret A. <mdale@proskauer.com>; Mazurek, Carl A. <cmazurek@proskauer.com>; Rosen, Brian S. <brosen@proskauer.com>; Levitan, Jeffrey W. <JLevitan@proskauer.com>; Possinger, Paul V. <ppossinger@proskauer.com>; pfriedman@omm.com; Sushon, Bill <wsushon@omm.com>; McKeen (External), Elizabeth <emckeен@omm.com>; Neve, Brett M. <bneve@omm.com>; Bongartz, Alex <alexbongartz@paulhastings.com>; Despins, Luc A. <lucdespins@paulhastings.com>; csteege@jenner.com; Sooknanan, Sparkle L. <ssooknanan@jonesday.com>; mpocha@omm.com; csloane@whitecase.com; csloane@whitecase.com

Subject: RE: Agenda for April 1 Hearing: In re Commonwealth of Puerto Rico, et al., Case No. 17-3283 (LTS) // In re Employees Retirement System of Gov't of Commonwealth of Puerto Rico, Case No. 17-3566 (LTS)

The Committee is available for a call at 2:00 p.m. today if that works for others. Please include us on the circulation of the dial-in. I would note that Judge Dein's order requires the parties to indicate which counsel intends to address each argument. To that end, any proposal submitted to chambers should indicate that the Committee's counsel may address any of the arguments set forth in the Oversight Board's motion to compel.

From: Dalsen, William D. <wdalsen@proskauer.com>

Sent: Thursday, March 28, 2019 9:24 PM

To: Papez, Matthew E. <mpapez@jonesday.com>; mpocha@omm.com

Cc: Stewart, Geoffrey S. <gstewart@JonesDay.com>; Bennett, Bruce S. <bbennett@jonesday.com>; Rosenblum, Benjamin <brosenblum@JonesDay.com>; Perez, Isel M. <iperez@jonesday.com>; afernandez@delgadofernandez.com; jcunningham@whitecase.com; izakia@whitecase.com; Martin, Moneyede <moneyede.martin@whitecase.com>; alavergne@sanpir.com; Dale, Margaret A. <mdale@proskauer.com>; Mazurek, Carl A. <cmazurek@proskauer.com>; Rosen, Brian S. <brosen@proskauer.com>; Levitan, Jeffrey W. <JLevitan@proskauer.com>; Possinger, Paul V. <ppossinger@proskauer.com>; pfriedman@omm.com; Sushon, Bill <wsushon@omm.com>; McKeen (External), Elizabeth <emckeен@omm.com>; Neve, Brett M. <bneve@omm.com>; Bassett, Nicholas <nicholasbassett@paulhastings.com>; Bongartz, Alex <alexbongartz@paulhastings.com>; Despins, Luc A. <lucdespins@paulhastings.com>; csteege@jenner.com; Sooknanan, Sparkle L. <ssooknanan@jonesday.com>; mpocha@omm.com; csloane@whitecase.com; csloane@whitecase.com

Subject: [EXT] RE: Agenda for April 1 Hearing: In re Commonwealth of Puerto Rico, et al., Case No. 17-3283 (LTS) // In re Employees Retirement System of Gov't of Commonwealth of Puerto Rico, Case No. 17-3566 (LTS)

Matt –

Thanks for sending a proposal. We do not agree to the format you've proposed because it conflicts with typical motion practice and is overly complicated, in particular because it contemplates moving between broad, abstract concepts rather than the issues as they were briefed.

A clearer way to proceed for everyone involved (and for the Court in particular) would be to proceed issue by issue, with the moving party presenting first, followed by a response, followed by reply. For example, we could start with Movants' arguments concerning ESI/date range as to ERS and the Commonwealth, followed by opposition argument and argument by the Committees, and then reply argument; followed by argument concerning the privilege log; and so on.

Please advise whether Movants are amenable to that approach; if so, we will build out a more detailed proposed schedule following that format. As we disagree in the first instance, however, it makes sense to schedule a call tomorrow to discuss. We (the respondent parties) are available at 2:00 p.m. Eastern tomorrow. If that works, we'll circulate a dial-in.

Thank you.

--Will

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From: Papez, Matthew E. <mpapez@jonesday.com>

Sent: Thursday, March 28, 2019 3:33 PM

To: mpocha@omm.com; Dalsen, William D. <wdalsen@proskauer.com>

Cc: Stewart, Geoffrey S. <gstewart@JonesDay.com>; Bennett, Bruce S. <bbennett@jonesday.com>; Rosenblum, Benjamin <brosenblum@JonesDay.com>; Perez, Isel M. <iperez@jonesday.com>; afernandez@delgadofernandez.com; jcunningham@whitecase.com; izakia@whitecase.com; Martin, Moneyede <moneyede.martin@whitecase.com>; alavergne@sanpir.com; Dale, Margaret A. <mdale@proskauer.com>; Mazurek, Carl A. <cmazurek@proskauer.com>; Rosen, Brian S. <brosen@proskauer.com>; Levitan, Jeffrey W. <JLevitan@proskauer.com>; Possinger, Paul V. <ppossinger@proskauer.com>; pfriedman@omm.com; Sushon, Bill <wsushon@omm.com>; McKeen (External), Elizabeth <emckeен@omm.com>; Neve, Brett M. <bneve@omm.com>; 'Bassett, Nicholas' <nicholasbassett@paulhastings.com>; alexbongartz@paulhastings.com; lucdespins@paulhastings.com; cstegee@jenner.com; Dalsen, William D. <wdalsen@proskauer.com>; Sooknanan, Sparkle L. <ssooknanan@jonesday.com>; mpocha@omm.com; csloane@whitecase.com; csloane@whitecase.com

Subject: Agenda for April 1 Hearing: In re Commonwealth of Puerto Rico, et al., Case No. 17-3283 (LTS) // In re Employees Retirement System of Gov't of Commonwealth of Puerto Rico, Case No. 17-3566 (LTS)

Counsel,

Judge Dein's March 27, 2019 Order requires the parties to confer with each other and submit a proposed agenda for the April 1 hearing. We prepared the below draft agenda for consideration. We believe that this order of argument will be the most efficient way for the hearing to proceed, because any guidance that Judge Dein may provide on threshold issues like relevance will likely help facilitate the discussion of the later issues. Please let us know if you agree to this agenda, or if you would like to discuss the agenda.

- I. Motion of Certain Secured Creditors of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Compel Discovery.
 - a. Relevance of the Discovery that the Bondholders are Seeking
 - b. Respondents' Burden Objections to the Bondholders' Discovery and Requested Date Range
 - c. Bondholders' Motion to Compel Respondents to Produce a Compliant Privilege Log
 - d. Bondholders' Motion to Compel the Oversight Board to Produce Documents and to Designate a Deponent
 - e. Bondholders' Motion to Compel Complete Responses to the Bondholders' Interrogatories
- II. Motion of the Oversight Board to Compel Answers to Interrogatories (and Production of Related Documents) from Movants

Thanks,
Matt

Matthew E. Papez (bio)

Partner

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